

Memorandum



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DATE : June 7, 1982

TO : Joseph Recchi

FROM : Katherine Fletcher

SUBJECT : PCB Management

Handwritten note: 12/21/82 C. Con
Signature: [illegible]

As Fred Mandapat and I have each discussed with you, our PCB storage areas and recordkeeping were inspected by the Environmental Protection Agency (EPA) on April 27. The comments made by the inspectors indicate that we would be wise to make several decisions concerning PCB storage and management procedures.

Current PCB storage at the South Service Center includes 60 barrels of predominantly nonleaking capacitors stacked in the basement of Building A, a few barrels of transformers and capacitors stored in the official PCB storage shed in the yard, approximately 600 nonleaking capacitors stored on 24 sleds or pallets next to the PCB storage shed outside, and a few barrels of PCB articles such as clothing and soil which are stored in two cargo containers located in the yard near the PCB storage building. While we will probably not receive a formal report from the EPA for another week or so, we do know the concerns indicated during the inspection, most of them technical: some of the barrels in the basement were not labeled; dates when capacitors were put into barrels were not noted; a nonleaking PCB transformer stored in a metal box had been removed from service but not moved to the official storage area within the 30 day limit; recordkeeping needed minor adjustments to be considered complete; the cargo container buildings are not bermed and therefore we must be careful to exclude PCB and non-PCB articles such as tools or clothing from them; and we have not formally designated the basement of Building A as an official PCB storage area. Of primary concern was the fact that it appeared we had significantly exceeded the storage capacity required for our volume of wastes, and that a leaking capacitor was sitting on a sled 5 to 10 feet away from a storm drain.

Since the inspection, several activities have occurred:

- Operations held a meeting with Distribution, Materials Management and the Office of Environmental Affairs (OEA) in order to modify recordkeeping procedures.
- Materials Management and Operations personnel have rectified most of the problems: all barrels have been labeled and dated, and the

leaking capacitor has been barreled. The PCB transformer remains to be moved into the official storage area, and the PCB articles have not yet been moved from the unofficial cargo containers.

- Materials Management has researched the cost of immediate disposal of the PCB wastes stored at the South Service Center and has urged the budgeting of \$550,000 for the 1983 budget for permanent PCB disposal in order to avoid further storage problems. OEA has given them estimates from competing firms.
- I have personally visited the South Service Center to review these actions, and particularly to discuss with Materials Management personnel the corrective actions to achieve storage capacity. Our PCB building must have the capacity to store at least 10% of the volume of PCB waste that we are holding in open storage outside the building, in case leaks or accidents develop with this equipment. We currently do not have this capability: our building is too small to accommodate 10% of the capacitors stored on the nearby sleds in the yard. However, subsequent discussions with the EPA have revealed that our storage of PCB's in barrels in the basement of Building A could be continued if (a) only barrels of nonleaking capacitors are stored there and (b) we rope off the area and designate it as a PCB storage area. In other words, barrels technically fall under the category of a legal PCB storage container if they contain nonleaking capacitors. Therefore, we technically do have the required storage capacity if we were to put the majority of the nonleaking capacitors stored outside into barrels in the basement and if we were to open the barrels there to discover which, if any, might contain a leaking capacitor and remove those to our storage building.
- Materials Management, OEA and the architects office have determined that a new storage building with the capacity to provide legal storage for 10% of the capacitors stored outside would cost approximately \$25,000. However, if the proposed EPA rules are accepted in August, nonleaking capacitors will no longer be allowed to be stored outside (unless they are in barrels). Another building space would probably be needed at that time unless we go to a policy of immediate shipment of PCB waste every time our current storage capacity is reached. There are still approximately 7,000 PCB capacitors in the system to be removed over the next 10 - 14 years.

At this point it is unclear whether the letter pending from EPA would simply involve a warning, immediate fines, a grace period for us to

arrange adequate facilities after which there would be a fine, or a combination of the above. In order to respond to the EPA, these decisions need to be made:

Decision 1. What disposal or storage options should be pursued in the short term in order to meet standards?

Option 1: Immediate disposal by contracting for shipment with a PCB disposal firm, or with the two accepted incinerating firms.

Advantages

- (a) Reduced risk to costly accidents, environmental contamination or future compliance errors;
- (b) Reduced time in inspection and maintenance of the storage area;
- (c) Reduced cost of labor and barrels if capacitors are shipped on sleds;
- (d) Increased space in warehouse yard; and
- (e) Immediate compliance with EPA rules and reduced risk of fines or penalties.

Disadvantages

- (a) Immediate special appropriation by the Council for funds for at least two shipments of waste, with funds for a third shipment needed shortly thereafter.

Estimate: Approximately \$150,000

- (b) Potentially higher cost for disposal than will be incurred in a year if new technologies are developed or cheaper options are available nearer to the region. It is too early to tell whether either of these options will occur.

Option 2: Continued storage, no new building.

Advantages

- (a) Potentially cheaper disposal prices by January 1, 1984 at which time Seattle City Light will probably have to dispose of all PCB

wastes collected by then as stated in the proposed EPA rules. Our current policy of storing PCB waste has been reasonable and justified given that the transportation and incineration costs to the only two EPA-approved sites at El Dorado, Arkansas and Deer Park, Texas are exorbitant. Many utilities in the region have been following this policy "hold onto" also, waiting to see if an incinerator will be built and approved closer to this region, or if an at-sea incinerator will be available.

- (b) The disposal costs could be obtained through the normal budget process rather than through special appropriation.

Disadvantages

- (a) All 60 barrels in the basement would have to be opened and checked to determine which barrels contain leaking capacitors. Barrels with leakers would then have to be removed to the PCB storage shed, and the other barrels shipped. The basement in Building A could then be roped off and designated as a PCB storage area.
- (b) All other nonleaking capacitors on the sleds would have to be barreled and moved into the basement.
- (c) Less storage or workspace both in the basement and in the PCB storage yard.
- (d) Continued risk of accidents or compliance errors.
- (e) Continued costs for inspection, recordkeeping and maintenance.

Option 3: Continued storage, with a new building.

Advantages

- (a) Potentially cheaper disposal option available in the future.
- (b) A larger portion of capacitor banks could remain on sleds outside rather than being barreled prior to shipment, thus saving space, labor and barrels.
- (c) Guaranteed compliance with EPA requirements.

Disadvantages

- (a) Cost of building: estimated approximately \$25,000.
- (b) Commitment of storage space in the yard to a building which will no longer be needed after PCB's are pulled out of the system in 10 years.
- (c) The continued storage of capacitors outside the building will continue Seattle City Light risk to accidents and future compliance errors.
- (d) Continued costs for inspection, recordkeeping and maintenance.

Question: Do you want immediate permanent disposal of PCB wastes? If so, OEA will begin to work with Materials Management to pursue a special appropriation from the Council.

Decion II: What disposal or storage options should be pursued in the long-term?

The pending permanent August rulings on PCB's indicate that all capacitors and PCB transformer wastes may have to be shipped for permanent disposal within one year of being pulled out of the system. Capacitors will only be allowed to be stored outside for 30 days. Will the number of barrels phased out of the Seattle City Light system annually for the next ten years or so be best accommodated by:

- (1) a combination of basement storage in Building A and storage in the current building, pending the cheapest rate for PCB destruction in each year?
- (2) Storage in a new building or buildings pending the cheapest shipment each year?
- (3) Use of the current building and/or one more, with continual permanent disposal as soon as existing capacity is reached?

Whichever of these options is chosen, it will need to be reexamined as new technologies for PCB destruction are made available. However, since the choice of a short term disposal option has a direct bearing upon the long-term disposal option in terms of commitment to a building, labor, barrels, budgeting or special appropriation, it appears prudent to make a long-term decision at this time.

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Decision III. What is the best means of internal coordination to provide reliable PCB storage disposal and compliance?

Option 1: Continued use of current policy and procedures.

A set of policy and procedures were drafted and sent to the Superintendent's Office a year ago. Apparently these policies were found unacceptable. A meeting could be held to review the inadequacies of this draft, and to establish acceptable procedures with the Superintendent's Office and appropriate divisions. This draft evidently continued a scheme of multiple division responsibility for PCB management and compliance. This does not necessarily insure that information regarding the quantities and location of existing PCB wastes in storage is coordinated with information on the rate at which PCB capacitors will be collected from the system in such a way that adequate safe storage and cost-effective disposal can be easily implemented.

Option 2: Designation of one person in the utility as the person responsible for ensuring PCB compliance.

One person, possibly from Operations and probably not from OEA, be responsible for PCB compliance. While OEA would provide support in interpretation of the rules and regulations, this one person would be ultimately responsible for knowing the status of PCB transformers and capacitors, both in service and as they are pulled out, stored and disposed of; for ensuring that storage practices and facilities are adequate and up to standard; and for developing interdivisional procedures necessary to carry out the entire effort.

Recommendations

We recognize that many people within the utility will have information or perspectives concerning the best means for storing and disposing of PCB wastes. We have discussed the draft of this memo with individuals in Operations and Materials Management. We are now circulating the final copy to several divisions with the intent that they will formulate their own recommendations for your review. OEA's immediate recommendations include:

- (1) Immediate shipment of existing PCB wastes in order to reduce environmental risks and meet EPA storage requirements.

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- (2) Prompt commitment to a long-term storage or disposal strategy.
- (3) The designation of one person within the utility to be responsible for PCB compliance.
- (4) That a meeting be held between the Superintendent and appropriate divisions within two weeks of receipt of the EPA letter, in order to determine the best answer to these questions outlined in this memo. Our expectation would be that written input or response to this memo be received prior to the meeting in order that all options are on the table.

CD:rps

cc: Cowan Peha
Sickler
Mandapat
Gerstle
Fletcher
Cuplin
Tuffs, L.
Johnson, H.
DeVries
Norberg
Croll
Dyckman
OEA (3)
File

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